

December 10, 2003

Dave Navecky, Environmental Protection Specialist Section of Environmental Analysis, Surface Transportation Board 1925 K Street, NW Washington, DC 20423-0001

RE: Environmental Assessment STB Finance Docket No. 34305 Burlington Northern & Santa Fe Railway Co Construction/Operation Exemption in Merced Co, California Dear

Mr. Navecky:

Thank you for the opportunity to comment on the above environmental assessment.

The subject assessment appears to be based at least to some extent upon questionable information. On page 11 there is an estimated ADT (average daily trips) of 660 vehicles for Santa Fe Road, the street that the proposed spur line would cross to reach Quebecor.

It was a unanimous feeling of city staff members, discussing this matter at an inter-departmental meeting, that the 660 trips was highly inflated, or possibly some type of highly unusual aberration. A field visit in connection with the project review seems to bear this out; one vehicle was observed on the road in a 20-plus minute week morning period.

There are a few parcels located in the County, west of the City, that access onto Santa Fe Road in the general area (enclosed map). There parcels, currently all but undeveloped, would continue to have access westward, towards Beachwood Drive, within the County.

Santa Fe Road (adjacent to the south side of the Burlington Northern rail line) duplicates the function of a major parallel street, Santa Fe Drive, which is located adjacent to the north (opposite) side of the subject railroad tracks. Unfortunately, the eastern terminus of Santa Fe Road is at State Highway 59, immediately adjacent to Burlington Northern Railroad crossing of that highway.

Santa Fe Road intersects 59 at an acute angle, which creates difficulties for drivers attempting to enter into higher speed highway traffic. The railroad crossing is also somewhat elevated, also increasing visual problems. And, not surprisingly, because Highway 59 is a major road along the west edge of the City of Merced, it is projected that traffic higher speed traffic will increase substantially in the foreseeable future.

All things considered, Santa Fe Road at this point appears to be little-used side road. It's main function seems to be as a short-cut to by-pass a nearby traffic signal (Santa Fe Drive and Highway 59). City staff was unanimous in expressing concerns that perpetuation of Santa Fe Road will merely allow increasing traffic conflicts, as more traffic attempts to use it as a short-cut and requires access to Highway 59.

In the event you have any questions, please feel free to contact either Kim Espinosa or John Hofmann of the City of Merced Planning Staff, at (209) 385-6858.

Sincerely,

Jack D. Lesch, Director of

**Development Services** 

Cc: State of California Transportation Agency (Caltrans)

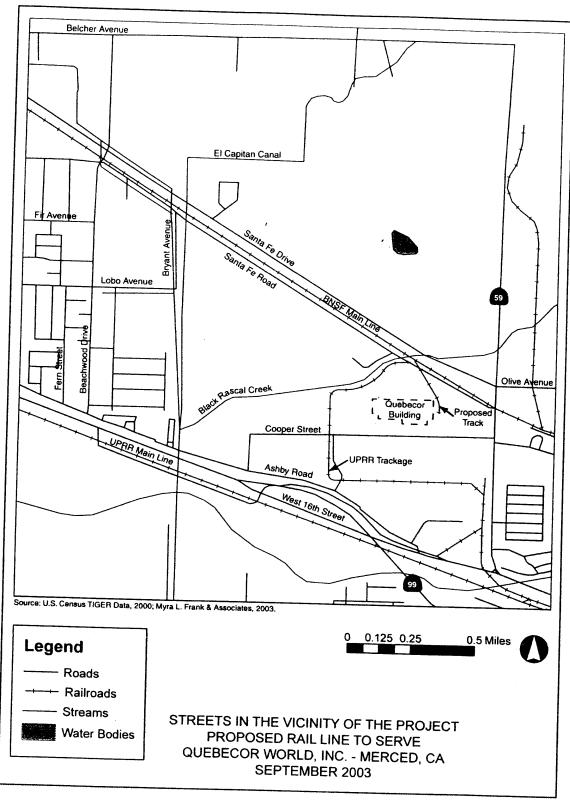


Figure 6